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9 Former Chapter 7 Trustee
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Hon. Mary Jo Heston
Chapter 13
Hearing Location: via Zoomgov
Hearing Date: June 6, 2023
Hearing Time: 1:00 p.m.
Response Date: May 30, 2023

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8 UNITED STATES BANKRUPTCY COURT
9 WESTERN DISTRICT OF WASHINGTON
10 AT TACOMA
11
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In re
13 PATRICIA ZOILA LUNA,
14 Debtor(s).
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Case No. 20-40671-MJH
17

FORMER CHAPTER 7 TRUSTEE'S
APPLICATION FOR COMPENSATION
AND ORDER AUTHORIZING
PAYMENT OF FEES TO GENERAL
COUNSEL FOR TRUSTEE
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The Former Chapter 7 Trustee, Russell D. Garrett, files this Application for
Compensation and Order Authorizing Payment of Fees to General Counsel for Trustee. For the
Application, the Trustee relies upon the points and authorities cited herein, the Declaration of
Russell D. Garrett, submitted herewith, and the Court's records and files.

1. The Debtor filed the present Chapter 7 Bankruptcy Petition on March 5, 2020,
and Russell D. Garrett was appointed the Chapter 7 Bankruptcy Trustee.

2. On February 8, 2021, an Order Granting Application to Employ Jordan Ramis PC
as attorneys for Trustee was entered with the Court [Dkt. No. 107].

3. General Counsel for Trustee requests final compensation for legal services
rendered in this case in the amount of \$19,237.50 in attorney's fees and \$3,037.07 in costs for a
total of \$22,274.57.

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4. On November 3, 2022, an Order Granting Application to Employ Premier
Partners Realty Inc. dba Keller Williams Premier Partners and Christine Dunn (“Realtor”) was
entered with the court [Dkt. No. 140]. The Realtor will not be submitting a fee application.

4 5. The application submitted herewith contains additional details regarding the legal
5 services performed by the General Counsel for Trustee and includes an itemized time narrative
6 of services performed by counsel. It is filed consistent with Western District of Washington LR
7 2016-1.

8 A proposed form of Order is filed as an exhibit to this motion.

9 WHEREFORE, the Trustee requests that the Court enter an order approving
10 compensation for Jordon Ramis PC, General Counsel for Trustee in the amount of \$19,237.50 in
11 attorney's fees and \$3,037.07 in costs for a total of \$22,274.57.

12 The Trustee also requests Court approval to pay Jordan Ramis PC its fees approved upon
13 entry of the Order or as soon as practicable or through the Debtor's Chapter 13 Plan.

14 DATED this 28th day of April, 2023

JORDAN RAMIS PC

By: /s/ Russell D. Garrett
Russell D. Garrett, WSBA #18657
Former Chapter 7 Trustee

**FORMER CHAPTER 7 TRUSTEE'S APPLICATION FOR
COMPENSATION AND ORDER AUTHORIZING
PAYMENT OF FEES TO GENERAL COUNSEL FOR
TRUSTEE - Page 2**

JORDAN RAMIS PC
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1 **CERTIFICATE OF SERVICE**

2 I hereby certify that on the date shown below, I electronically filed the foregoing
3 FORMER CHAPTER 7 TRUSTEE'S APPLICATION FOR COMPENSATION AND ORDER
4 AUTHORIZING PAYMENT OF FEES TO GENERAL COUNSEL FOR TRUSTEE and
5 PROPOSED ORDER with the Clerk of the Court using the CM/ECF system which will send
6 notification of such filing to the following:

7 **VIA ECF NOTICE:**

8 United States Trustee
9 USTPREGION18.SE.ECT@usdoj.gov

10 David C. Clarke
11 Clarke Law Office
11 3875 SW Hall Blvd, Suite C
11 Beaverton, OR 97005

12 Tim Coleman
13 OlsenDaines
13 PO Box 12829
14 Salem, OR 97309
14 Attorney for Debtor

15 **VIA US MAIL POSTAGE PREPAID:**

16 -All creditors on Creditor Matrix-

17 DATED this 28th day of April, 2023.

19 JORDAN RAMIS PC

21 By: /s/ Russell D. Garrett
22 Russell D. Garrett, WSBA #18657
22 Former Chapter 7 Trustee